

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDGE CAPTURE L.L.C., and EDGE
SPECIALISTS, L.L.C.,

Plaintiffs,

V.

BARCLAYS BANK PLC, BARCLAYS
CAPITAL INC., UBS AG, UBS
FINANCIAL SERVICES INC., UBS
SECURITIES LLC, WOLVERINE
TRADING, L.L.C., AND WOLVERINE
EXECUTION SERVICES, L.L.C.,

Defendants.

Civil Action No. 09 CV 1521

JURY TRIAL DEMANDED

Judge Charles R. Norgle, Sr.

Magistrate Judge Denlow

**THE BARCLAYS AND UBS DEFENDANTS' MOTION
TO PREVENT DISCLOSURE OF THEIR CONFIDENTIAL INFORMATION
TO DR. ISRAEL NELKEN**

Defendants Barclays Bank PLC and Barclays Capital Inc. (collectively, “Barclays”), and UBS AG, UBS Financial Services Inc., and UBS Securities LLC (collectively, “UBS”), respectfully move the Court for an order preventing Plaintiffs Edge Capture L.L.C. and Edge Specialists, L.L.C. (collectively, “Edge”) from disclosing Barclays’ and UBS’s confidential information to Edge’s expert, Dr. Israel Nelken.

The potential for significant, irreversible harm to Barclays and UBS if their confidential information is inadvertently disclosed to a competitor and/or used to develop competing applications greatly outweighs any minor inconvenience to Edge of having to select another expert at this early stage (before Edge has even served its initial infringement contentions) or rely on its four other designated experts. Therefore, good cause exists to prevent the disclosure of the Barclays and UBS defendants’ confidential information.

This Motion is based upon this Motion, the attached Notice of Motion and Memorandum of Law, Declaration of Jeffrey G. Randall and attached Exhibits, the papers and pleadings on file in this action, and such other and further evidence as may subsequently be presented to the Court.

Respectfully submitted,

Dated: September 22, 2011

By: /s/ Jeffrey G. Randall

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Capital Inc., UBS AG, UBS Financial Services Inc., and
UBS Securities LLC*

CERTIFICATE OF SERVICE

I, Jeffrey G. Randall, hereby certify that on September 22, 2011, I caused a true and correct copy of The Barclays and UBS Defendants' Motion to Prevent Disclosure of Their Confidential Information to Dr. Israel Nelken to be served by electronic filing using the CM/ECF system upon:

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